

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	

**NOTICE OF AGENDA OF MATTERS SET FOR
HEARING ON AUGUST 24, 2020 AT 1:30 P.M. (CST)**

The above-referenced debtors and debtors in possession (collectively, the “**Debtors**”) hereby file their Agenda of Matters Set for Hearing on **August 24, 2020 at 1:30 p.m. (CST)** before the Honorable Marvin Isgur.

I. CONTESTED MATTER

1. **Emergency Motion of Debtors for Order (I) Authorizing Debtors to (A) Enter Into and Perform Under New Postpetition Hedging Agreements, and (B) Grant Related Liens and Superpriority Claims, (II) Modifying Automatic Stay, and (III) Granting Related Relief (ECF No. 185)**

Status: This matter is going forward on a contested basis.

Responses:

- A. W&T Offshore, Inc.’s Limited Objection to Debtors’ Emergency Motion for Order (I) Authorizing Debtors to (A) Enter Into and Perform Under New Postpetition Hedging Agreements, and (B) Grant Related Liens and Superpriority Claims, (II) Modifying the Automatic Stay, and (III) Granting Related Relief (ECF No. 198)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Related Documents:

- B. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- C. W&T Offshore, Inc.'s Witness and Exhibit List for Hearing Scheduled for August 24, 2020 at 1:30 p.m. (ECF No. 195)

II. ADJOURNED MATTERS

- 2. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 22)**

Status: Pursuant to the motion filed at ECF No. 219, the Debtors request that this matter be adjourned to **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**.

Responses:

- A. Limited Objection of Certain Texas Taxing Entities to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(d)(1) and 364(e) and (B) To Utilize Cash Collateral Pursuant to 11 U.S.C. 353, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. § 361, 362, 363, 364, and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 188)
- B. Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 192)
- C. Response of Cetco Energy Services Company, LLC to i. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief [P-7] and ii. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. §363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [P-22] (ECF No. 196)

- D. Joinder and Reservation of Rights of Certain Trade Creditors to Bedrock Petroleum Consultants, LLC's Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 200)
- E. W&T Offshore, Inc.'s Joinder in Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 201)
- F. Objection of Cypress-Fairbanks ISD, Galveston County, Harris County, Lavaca County, Live Oak CAD, Matagorda County, Rio Grande City CISD and Starr County to Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 202)
- G. Joinder and Reservation of Rights [of Halliburton Energy Services, Inc.] Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (Re: Docket No. 22, 192) (ECF No. 203)
- H. Joinder and Reservation of Rights of Partco, LLC to Bedrock Petroleum Consultants, LLC's Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 205)
- I. Limited Objection and Reservation of Rights of Ecopetrol America LLC to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 206)
- J. Joinder and Reservation of Rights of Acadian Contractors, Inc. to Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 211)
- K. Amended and Restated Response to i. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief [P-7] and ii. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3),

364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. §363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [P-22] (ECF No. 212)

- L. Joinder and Reservation of Rights of Broussard Brothers, Inc. to Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 213)
- M. Joinder and Reservation of Rights [of Diverse Safety & Scaffolding, LLC] Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 216)
- N. Joinder and Reservation of Rights [of Archrock Services LP] Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 218)

Related Documents:

- O. Declaration of John-Paul Hanson in Support of Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 23)
- P. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- Q. Notice of Filing of Revised Proposed Order (ECF No. 54)
- R. Interim Order (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 58)
- S. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- T. Bedrock Petroleum Consultants, LLC's Witness and Exhibit List for Hearing Scheduled for August 24, 2020 at 1:30 p.m. (ECF No. 194)

- U. W&T Offshore, Inc.'s Witness and Exhibit List for Hearing Scheduled for August 24, 2020 at 1:30 p.m. (ECF No. 195)
- V. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)

3. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief From Automatic Stay With Respect to Workers' Compensation Claims; and (III) Granting Related Relief (ECF No. 4)**

Status: Pursuant to the motion filed at ECF No. 219, the Debtors request that this matter be adjourned to **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**.

Responses:

- A. JX Nippon Oil Exploration (U.S.A.) Limited's Objection to Motion of Debtors for Final Order (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief From Automatic Stay With Respect to Workers' Compensation Claims; and (III) Granting Related Relief (ECF No. 189)

Related Documents:

- B. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- C. Notice of Filing of Revised Proposed Order (ECF No. 150)
- D. Interim Order (I) Authorizing Debtors to (A) Continue Insurance Programs and Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief From Automatic Stay With Respect to Workers' Compensation Claims; and (III) Granting Related Relief (ECF No. 152)
- E. JX Nippon Oil Exploration (U.S.A.) Limited's Witness and Exhibit List for Hearing Scheduled for 1:30 P.M. on August 24, 2020 (ECF No. 190)
- F. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- G. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)

4. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief (ECF No. 7)**

Status: Pursuant to the motion filed at ECF No. 219, the Debtors request that this matter be adjourned to **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**.

Responses:

- A. Response to i. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief [P-7] and ii. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. §363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [P-22] (ECF No. 196)
- B. W&T Offshore, Inc.'s Limited Objection to Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief (ECF No. 197)

Related Documents:

- C. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- D. Interim Order (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims; and (II) Granting Related Relief (ECF No. 62)
- E. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- F. W&T Offshore, Inc.'s Witness and Exhibit List for Hearing Scheduled for August 24, 2020 at 1:30 p.m. (ECF No. 195)
- G. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)

5. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, and (D) Continue Utilizing Corporate Credit Cards; and (II) Granting Related Relief (ECF No. 6)**

Status: Pursuant to the motion filed at ECF No. 219, the Debtors request that this matter be adjourned to **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**.

Related Documents:

- A. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- B. Interim Order (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, and (D) Continue Utilizing Corporate Credit Cards; and (II) Granting Related Relief (ECF No. 49)
- C. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- D. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)

6. **Emergency Motion of Debtors for Interim and Final Orders Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Claims of Certain Worthless Stock Deductions (ECF No. 8)**

Status: Pursuant to the motion filed at ECF No. 219, the Debtors request that this matter be adjourned to **September 14, 2020 at 1:30 P.M. (prevailing Central Time)**.

Related Documents:

- A. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- B. Interim Order Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Claims of Certain Worthless Stock Deductions (ECF No. 50)
- C. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- D. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)

Dated: August 21, 2020
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that, on August 21, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez